

**From:** Melinda Montovani <mmontovani@biact.org>  
**Sent:** Wednesday, November 13, 2013 12:53 PM  
**To:** SIM, OHA  
**Subject:** Brain Injury Alliance of Connecticut Feedback on SIM Draft Document

Dear SIM Steering Committee,

The **Brain Injury Alliance of CT (BIAC)** agrees it is important to reform CT's health care system, to promote quality, keep coverage affordable, and 'do no harm' as we try to repair a fragmented system.

To 'do no harm,' the SIM draft plan has to be amended to clearly include each of these elements:

- Providers found to have denied or restricted access to necessary care need to be prohibited from receiving shared savings or other financial rewards
  - The system to measure and sanction under-treatment needs to be in place before any provider incentives are implemented
  - Quality measures of under-treatment, including inappropriate denials or limitations on care or avoidance of expensive patients, needs to be developed by an inclusive committee with significant independent consumer advocacy membership
- Independent consumer advocates need to be immediately added in meaningful numbers, before the plan is finalized, to all SIM committees.
- All decisions about the SIM plan need to be reached in a transparent way, using a public process based on significant public input
- As in the first SIM plan draft, downside risk payment models need to be excluded in the Medicaid program.

We appreciate your consideration of these points as we believe it is imperative that they be included to ensure harm does not come to anyone as a result of the SIM changes. Thank you.

Sincerely,

*Julie Peters*

Julie Peters  
Executive Director  
&

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